

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
January 2024 Grand Jury

UNITED STATES OF AMERICA,
Plaintiff,
v.
ALFREDO FLORES and
RODOLFO RODRIGUEZ, JR.,
Defendants.

No. **2:24-CR-00252-DMG**

I N D I C T M E N T

[21 U.S.C. § 846: Conspiracy to Distribute and to Possess with Intent to Distribute Methamphetamine; 21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii): Distribution of Methamphetamine; 21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii): Possession with Intent to Distribute Methamphetamine; 21 U.S.C. § 853: Criminal Forfeiture]

The Grand Jury charges:

COUNT ONE

[21 U.S.C. § 846]

[ALL DEFENDANTS]

A. OBJECTS OF THE CONSPIRACY

Beginning on a date unknown to the Grand Jury, and continuing until on or about July 7, 2021, in Los Angeles and San Bernardino Counties, within the Central District of California, and elsewhere, defendants ALFREDO FLORES and RODOLFO RODRIGUEZ, JR., and others

1 known and unknown to the Grand Jury, conspired with each other to
2 knowingly and intentionally distribute and possess with intent to
3 distribute at least 50 grams of methamphetamine, a Schedule II
4 controlled substance, in violation of Title 21, United States Code,
5 Sections 841(a)(1), (b)(1)(A)(viii).

6 B. MEANS BY WHICH THE OBJECTS OF THE CONSPIRACY WERE TO BE
7 ACCOMPLISHED

8 The objects of the conspiracy were to be accomplished, in
9 substance, as follows:

10 1. Defendant FLORES would arrange for the sale of
11 methamphetamine to customers in Southern California.

12 2. Defendant FLORES would direct defendant RODRIGUEZ and
13 others known and unknown to the Grand Jury, to deliver
14 methamphetamine to customers in Southern California.

15 3. Defendant RODRIGUEZ and others known and unknown to the
16 Grand Jury, would deliver methamphetamine to customers in Southern
17 California.

18 4. Defendant FLORES would direct customers where and how to
19 provide payment for the methamphetamine supplied by defendants FLORES
20 and RODRIGUEZ, and others known and unknown to the Grand Jury.

21 C. OVERT ACTS

22 On or about the following dates, in furtherance of the
23 conspiracy and to accomplish its objects, defendants FLORES and
24 RODRIGUEZ, and others known and unknown to the Grand Jury, committed
25 various overt acts in Los Angeles and San Bernardino Counties, within
26 the Central District of California, and elsewhere, including, but not
27 limited to, the following:

1 1. On October 15, 2020, defendant FLORES arranged for a
2 courier ("Courier 1") to transport and distribute approximately five
3 pounds of methamphetamine to an individual he believed was a
4 methamphetamine customer, but who was, in fact, a confidential
5 informant working with law enforcement ("CI-1").

6 2. On October 20, 2020, in South Gate, California, at the
7 direction of defendant FLORES, Courier 1 distributed approximately
8 2,197 grams of methamphetamine to CI-1.

9 3. On or about May 3, 2021, defendant FLORES arranged for a
10 courier ("Courier 2") to transport and distribute approximately eight
11 pounds of methamphetamine to CI-1.

12 4. On May 4, 2021, in South Gate, California, at the direction
13 of defendant FLORES, Courier 2 distributed approximately 3,509 grams
14 of methamphetamine to CI-1.

15 5. On May 5, 2021, in Whittier, California, at the direction
16 of defendant FLORES, Courier 2 distributed approximately 897 grams of
17 methamphetamine to CI-1.

18 6. On or about June 30, 2021, defendant FLORES arranged for
19 defendant RODRIGUEZ to transport and distribute approximately 10
20 pounds of methamphetamine to CI-1.

21 7. On June 30, 2021, in Long Beach, California, defendant
22 RODRIGUEZ distributed approximately 4,283 grams of methamphetamine to
23 CI-1.

24 8. On or about July 7, 2021, in Long Beach, California,
25 defendant RODRIGUEZ possessed in his residence approximately 18.965
26 kilograms of methamphetamine.

1 COUNT TWO

2 [21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii); 18 U.S.C. § 2(a)]

3 [DEFENDANT FLORES]

4 On or about October 20, 2020, in Los Angeles County, within the
5 Central District of California, defendant ALFREDO FLORES and others
6 known and unknown, each aiding and abetting the others, knowingly and
7 intentionally distributed at least fifty grams, that is,
8 approximately 2,197 grams, of methamphetamine, a Schedule II
9 controlled substance.

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

1 COUNT THREE

2 [21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii); 18 U.S.C. § 2(a)]

3 [DEFENDANT FLORES]

4 On or about May 4, 2021, in Los Angeles County, within the
5 Central District of California, defendant ALFREDO FLORES and others
6 known and unknown, each aiding and abetting the others, knowingly and
7 intentionally distributed at least fifty grams, that is,
8 approximately 3,509 grams, of methamphetamine, a Schedule II
9 controlled substance.

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

1 COUNT FOUR

2 [21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii); 18 U.S.C. § 2(a)]

3 [DEFENDANT FLORES]

4 On or about May 5, 2021, in Los Angeles County, within the
5 Central District of California, defendant ALFREDO FLORES and others
6 known and unknown, each aiding and abetting the others, knowingly and
7 intentionally distributed at least fifty grams, that is,
8 approximately 897 grams, of methamphetamine, a Schedule II controlled
9 substance.

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

1 COUNT FIVE

2 [21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii); 18 U.S.C. § 2(a)]

3 [DEFENDANTS FLORES and RODRIGUEZ]

4 On or about June 30, 2021, in Los Angeles County, within the
5 Central District of California, defendants ALFREDO FLORES and RODOLFO
6 RODRIGUEZ, JR., each aiding and abetting the other, knowingly and
7 intentionally distributed at least fifty grams, that is,
8 approximately 4,283 grams, of methamphetamine, a Schedule II
9 controlled substance.

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

1 COUNT SIX

2 [21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii)]

3 [DEFENDANT RODRIGUEZ]

4 On or about July 7, 2021, in Los Angeles County, within the
5 Central District of California, defendant RODOLFO RODRIGUEZ, JR.
6 knowingly and intentionally possessed with intent to distribute at
7 least fifty grams, that is, approximately 18.965 kilograms, of
8 methamphetamine, a Schedule II controlled substance.

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

1 FORFEITURE ALLEGATION

2 [21 U.S.C. § 853]

3 1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal
4 Procedure, notice is hereby given that the United States of America
5 will seek forfeiture as part of any sentence, pursuant to Title 21,
6 United States Code, Section 853, in the event of any defendant's
7 conviction of the offenses set forth in any of Counts One through Six
8 of this Indictment.

9 2. Any defendant so convicted, shall forfeit to the United
10 States of America the following:

11 (a) All right, title and interest in any and all property,
12 real or personal, constituting or derived from, any proceeds which
13 said defendant obtained, directly or indirectly, from any such
14 offense;

15 (b) All right, title and interest in any and all property,
16 real or personal, used, or intended to be used, in any manner or
17 part, to commit, or to facilitate the commission of any such offense;
18 and

19 (c) To the extent such property is not available for
20 forfeiture, a sum of money equal to the total value of the property
21 described in subparagraphs (a) and (b).

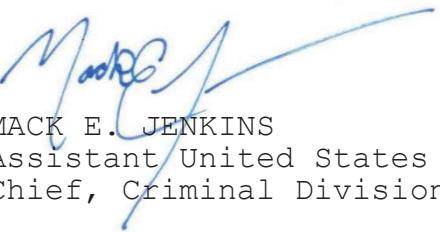
22 3. Pursuant to Title 21, United States Code, Section 853(p),
23 any defendant so convicted, shall forfeit substitute property if, by
24 any act or omission of said defendant, the property described in the
25 preceding paragraph, or any portion thereof: (a) cannot be located
26 upon the exercise of due diligence; (b) has been transferred, sold
27 to, or deposited with a third party; (c) has been placed beyond the
28 jurisdiction of the court; (d) has been substantially diminished in

1 value; or (e) has been commingled with other property that cannot be
2 divided without difficulty.

3 A TRUE BILL
4

5 /s/
6 Foreperson

7 E. MARTIN ESTRADA
8 United States Attorney

9 
10 MACK E. JENKINS
11 Assistant United States Attorney
12 Chief, Criminal Division

13 J. MARK CHILDS
14 Assistant United States Attorney
15 Chief, International Narcotics,
16 Money Laundering, and
17 Racketeering Section

18 CHRISTOPHER C. KENDALL
19 Assistant United States Attorney
20 Deputy Chief, International
21 Narcotics, Money Laundering,
22 and Racketeering Section

23
24
25
26
27
28